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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JUDGE JOAN H. LEFKOW

UNITED STATES OF AMERICA

No. 07 CR 843

v.

RONDELL FREEMAN, aka "Nightfall," "Fall"  
BRIAN WILBOURN, aka "Stay High," "3"  
DANIEL HILL, aka "Little Burling," "Little B"  
ADAM SANDERS, aka "Redman"  
DEMARQUIS WILLIAMS, aka "Buck," "Marco"  
SENECCA WILLIAMS, aka "Boo Boo"  
REGINALD BOOKER, aka "Bob"  
SYBLE MCCLATCHEY, aka "Silver"  
ROBERT FREEMAN, aka "G Rob," "Bob"  
CLINT LINZY, aka "Big Shorty"  
LONNIE MACK, aka "L Dub," "Dub," "4"  
LANCE OLDEN, aka "LA"  
DESHAWN SIMMONS, aka "Duke"  
MARCELL THOMAS, aka "Lil Cell," "Cell"  
DARNELL WILLIAMS, aka "Don D"

Violations: Title 21, United States Code,  
Sections 841(a)(1), 843(b), 846;  
Title 18, United States Code,  
Sections 2, 922(g)(1), 924(c)

FILED

APR 16 2008 TC

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

COUNT ONE

MAGISTRATE JUDGE SCHENKIER

The SPECIAL MARCH 2007 GRAND JURY charges:

1. Beginning in or around 1998, and continuing until in or around December 2007, in

Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

RONDELL FREEMAN, aka "Nightfall," "Fall"  
BRIAN WILBOURN, aka "Stay High," "3"  
DANIEL HILL, aka "Little Burling," "Little B"  
ADAM SANDERS, aka "Redman"  
DEMARQUIS WILLIAMS, aka "Buck," "Marco"  
SENECCA WILLIAMS, aka "Boo Boo"  
REGINALD BOOKER, aka "Bob"  
SYBLE MCCLATCHEY, aka "Silver"  
ROBERT FREEMAN, aka "G Rob," "Bob"  
CLINT LINZY, aka "Big Shorty"  
LONNIE MACK, aka "L Dub," "Dub," "4"  
LANCE OLDEN, aka "LA"

DESHAWN SIMMONS, aka "Duke"  
MARCELL THOMAS, aka "Lil Cell," "Cell"  
DARNELL WILLIAMS, aka "Don D"

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury, knowingly and intentionally to distribute and to possess with intent to distribute controlled substances, namely, 50 grams or more of mixtures and substances containing cocaine base in the form of crack cocaine ("crack cocaine"), and 5 kilograms or more of mixtures and substances containing cocaine, both Schedule II Narcotic Drug Controlled Substances; and 1 kilogram or more of mixtures and substances containing heroin, and mixtures and substances containing marijuana, Schedule I Controlled Substances, in violation of Title 21, United States Code, Section 841(a)(1).

2. It was part of the conspiracy that defendant RONDELL FREEMAN ran a narcotics distribution organization (hereinafter "the FREEMAN Drug Trafficking Organization," or "the FREEMAN DTO") that operated in and around the Cabrini Green public housing complex and elsewhere in Chicago, Illinois. FREEMAN supplied the FREEMAN DTO with wholesale quantities of crack cocaine, heroin, and marijuana, and the FREEMAN DTO was responsible for the sale of crack cocaine, heroin, and marijuana at the Cabrini Green housing complex located at 714 W. Division Street (the "714 Division Building"), and later, in and around the complex located at 1230 N. Burling Avenue (the "1230 Burling building"), and elsewhere in Chicago, Illinois.

3. It was further part of the conspiracy that the FREEMAN DTO obtained wholesale quantities of powder cocaine, heroin, and marijuana; cooked powder cocaine into crack cocaine; and distributed crack cocaine, heroin, and marijuana to members of the Gangster Disciples street gang and their associates for resale at the 714 Division and 1230 Burling buildings and elsewhere.

4. It was further part of the conspiracy that Individuals A and B and others regularly supplied wholesale quantities of drugs to RONDELL FREEMAN, who in turn at times supplied the drugs to members of the FREEMAN DTO for resale to others. At times, other individuals also supplied wholesale quantities of drugs to members of the FREEMAN DTO.

5. It was further part of the conspiracy that Individual A supplied defendants RONDELL and ROBERT FREEMAN with kilogram quantities of powder cocaine, some of which was then used to cook into crack cocaine for resale by the FREEMAN DTO.

6. It was further part of the conspiracy that the drugs distributed by the FREEMAN DTO were typically prepared and packaged by RONDELL FREEMAN and others, including defendants BRIAN WILBOURN, ROBERT FREEMAN, and SENECCA WILLIAMS. The drugs distributed by the FREEMAN DTO were packaged at different times in apartments at the 714 Division and 1230 Burling buildings in Cabrini Green, an apartment at 95<sup>th</sup> and Halsted, an apartment at 35<sup>th</sup> and King Drive, two apartments on Granville Avenue (one of which was known as the "Penthouse"), a condominium at 5740 N. Sheridan Road, Unit 3E ("the Sheridan Road Condominium"), and various other locations in Chicago.

7. It was further part of the conspiracy that the FREEMAN DTO sold crack cocaine, heroin, and marijuana through Gangster Disciples and their associates who worked at the 714 Division and 1230 Burling buildings, including defendants DANIEL HILL, BRIAN WILBOURN, ADAM SANDERS, LANCE OLDEN, LONNIE MACK, DESHAWN SIMMONS, MARCELL THOMAS, DARNELL WILLIAMS, DEMARQUIS WILLIAMS, REGINALD BOOKER, and SYBLE MCCLATCHEY, and others. The sellers operated in shifts and on a near-daily basis. The sellers carried packs filled with smaller \$5 and \$10 bags of crack cocaine, heroin, and marijuana.

8. It was further part of the conspiracy that defendants BRIAN WILBOURN, ADAM SANDERS, DANIEL HILL, REGINALD BOOKER and SYBLE MCCLATCHEY, on behalf of the FREEMAN DTO, transported drugs to the 1230 Burling building, and/or collected currency derived from the sale of narcotics by the FREEMAN DTO ("narcotics proceeds"), which they transported back to RONDELL FREEMAN and others. RONDELL FREEMAN routinely stored the narcotics proceeds at the Sheridan Road Condominium.

9. It was further part of the conspiracy that defendants DANIEL HILL, BRIAN WILBOURN, ADAM SANDERS, and LONNIE MACK supervised drug sales at the 714 Division and 1230 Burling buildings for the FREEMAN DTO. Defendants CLINT LINZY and SYBLE MCCLATCHEY served as look-outs at the 1230 Burling building to assist members of the FREEMAN DTO in avoiding detection and apprehension by law enforcement.

10. It was further part of the conspiracy that defendants RONDELL FREEMAN, BRIAN WILBOURN, DANIEL HILL, ADAM SANDERS, DEMARQUIS WILLIAMS, SENECCA WILLIAMS, REGINALD BOOKER, SYBLE MCCLATCHEY, ROBERT FREEMAN, CLINT LINZY, LONNIE MACK, LANCE OLDEN, DESHAWN SIMMONS, MARCELL THOMAS, and DARNELL WILLIAMS and various other co-conspirators used their membership in and affiliation with the Gangster Disciples street gang to facilitate the sale of cocaine, crack cocaine, heroin, and marijuana at the 714 Division and 1230 N. Burling buildings and elsewhere.

11. It was further part of the conspiracy that the defendants and other co-conspirators possessed and carried firearms and other weapons, and used threats of violence and violence to advance the conspiracy's objectives.

12. It was further part of the conspiracy that defendants and other co-conspirators would

and did conceal and hide, and cause to be concealed and hidden, the purposes of the acts done in furtherance of the conspiracy, and would and did use surveillance, counter-surveillance techniques, coded language, walkie-talkies, face masks, pat-downs, and other means to avoid detection and apprehension by law enforcement authorities and otherwise to provide security to the members of the conspiracy.

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT TWO

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about September 8, 2005, at Chicago, in the Northern District of Illinois, Eastern Division,

DARNELL WILLIAMS,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, mixtures and substances containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about March 25, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

RONDELL FREEMAN and BRIAN WILBOURN,

defendants herein, did knowingly and intentionally possess with the intent to distribute a controlled substance, namely, mixtures and substances containing heroin, a Schedule I Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT FOUR

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about March 25, 2006, at approximately 11:41 a.m., in the Northern District of Illinois, Eastern Division,

RONDELL FREEMAN and BRIAN WILBOURN,

defendants herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).



COUNT FIVE

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about March 25, 2006, at approximately 7:38 p.m., in the Northern District of Illinois, Eastern Division,

RONDELL FREEMAN and ROBERT FREEMAN,

defendants herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT SIX

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about March 25, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

RONDELL FREEMAN,

defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, namely, a Star Bonifacio Echeverria, model Ultra Star, 9mm semi-automatic handgun, bearing serial number 2125519, in that the firearm had traveled in interstate commerce prior to the defendant's possession of it;

In violation of Title 18, United States Code, Sections 922(g)(1).

COUNT SEVEN

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about March 25, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

BRIAN WILBOURN,

defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, namely, a Star Bonifacio Echeverria, model Ultra Star, 9mm semi-automatic handgun, bearing serial number 2125519, in that the firearm had traveled in interstate commerce prior to the defendant's possession of it;

In violation of Title 18, United States Code, Sections 922(g)(1).

COUNT EIGHT

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about March 25, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

RONDELL FREEMAN,

defendant herein, knowingly possessed a firearm, namely a Star Bonifacio Echeverria, model Ultra Star, 9mm semi-automatic handgun, bearing serial number 2125519, in furtherance of, and during and in relation to, a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, a violation of Title 21, United States Code, Section 846, as more fully set forth in Count One of this indictment;

In violation of Title 18, United States Code, Sections 924(c).

COUNT NINE

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about March 25, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

BRIAN WILBOURN,

defendant herein, knowingly possessed a firearm, namely a Star Bonifacio Echeverria, model Ultra Star, 9mm semi-automatic handgun, bearing serial number 2125519, in furtherance of, and during and in relation to, a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, a violation of Title 21, United States Code, Section 846, as more fully set forth in Count One of this indictment;

In violation of Title 18, United States Code, Sections 924(c).

COUNT TEN

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about March 29, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

BRIAN WILBOURN and ROBERT FREEMAN,

defendants herein, did knowingly and intentionally possess with the distribute a controlled substance, namely, 50 grams or more of mixtures and substances containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT ELEVEN

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about April 1, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

RONDELL FREEMAN and BRIAN WILBOURN,

defendants herein, did knowingly and intentionally possess with the distribute a controlled substance, namely, 50 grams or more of mixtures and substances containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT TWELVE

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about April 10, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

BRIAN WILBOURN,

defendant herein, did knowingly and intentionally possess with the intent to distribute a controlled substance, namely, 5 grams or more of mixtures and substances containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance, and mixtures and substances containing heroin, a Schedule I Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).



COUNT THIRTEEN

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about April 11, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

BRIAN WILBOURN,

defendant herein, did knowingly and intentionally possess with the distribute a controlled substance, namely, 5 grams or more of mixtures and substances containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance, and mixtures and substances containing heroin, a Schedule I Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOURTEEN

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about July 22, 2006, at approximately 11:19 p.m. (Call #4557 over Target Phone 4),  
in the Northern District of Illinois, Eastern Division,

RONDELL FREEMAN and DESHAWN SIMMONS,

defendants herein, knowingly and intentionally used a communication facility, namely a telephone,  
in committing and in causing and facilitating the commission of a felony violation of Title 21, United  
States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute  
controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT FIFTEEN

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about August 9, 2006, at approximately 10:03 p.m. (Call #5600 over Target Phone 4),  
in the Northern District of Illinois, Eastern Division,

RONDELL FREEMAN and DESHAWN SIMMONS,

defendants herein, knowingly and intentionally used a communication facility, namely a telephone,  
in committing and in causing and facilitating the commission of a felony violation of Title 21, United  
States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute  
controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT SIXTEEN

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about August 9, 2006, at approximately 11:04 p.m. (Call #5609 over Target Phone 4),  
in the Northern District of Illinois, Eastern Division,

RONDELL FREEMAN and SYBLE MCCLATCHEY,

defendants herein, knowingly and intentionally used a communication facility, namely a telephone,  
in committing and in causing and facilitating the commission of a felony violation of Title 21, United  
States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute  
controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTEEN

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about August 9, 2006, at approximately 11:08 p.m. (Call #5611 over Target Phone 4),  
in the Northern District of Illinois,

RONDELL FREEMAN and SYBLE MCCLATCHEY,

defendants herein, knowingly and intentionally used a communication facility, namely a telephone,  
in committing and in causing and facilitating the commission of a felony violation of Title 21, United  
States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute  
controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT EIGHTEEN

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about August 9, 2006, at approximately 11:37 p.m. (Call #5615 over Target Phone 4),  
in the Northern District of Illinois, Eastern Division,

RONDELL FREEMAN and SYBLE MCCLATCHEY,

defendants herein, knowingly and intentionally used a communication facility, namely a telephone,  
in committing and in causing and facilitating the commission of a felony violation of Title 21, United  
States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute  
controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT NINETEEN

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about October 20, 2006, at approximately 6:30 p.m. (Call #5503 over Target Phone 6), in the Northern District of Illinois, Eastern Division,

RONDELL FREEMAN and ADAM SANDERS,

defendants herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about October 23, 2006, at approximately 5:03 p.m. (Call #5659 over Target Phone 6), in the Northern District of Illinois, Eastern Division,

ADAM SANDERS,

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).



COUNT TWENTY-ONE

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about October 24, 2006, at approximately 12:36 a.m. (Call #5700 over Target Phone 6), in the Northern District of Illinois, Eastern Division,

ADAM SANDERS,

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-TWO

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about October 26, 2006, at approximately 5:46 p.m. (Call #6177 over Target Phone 6), in the Northern District of Illinois, Eastern Division,

ROBERT FREEMAN,

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-THREE

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about October 26, 2006, at approximately 6:06 p.m. (Call #6178 over Target Phone 6), in the Northern District of Illinois, Eastern Division,

ROBERT FREEMAN,

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-FOUR

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about October 26, 2006, at approximately 9:40 p.m. (Call #5424 over Target Phone 7), in the Northern District of Illinois, Eastern Division,

DANIEL HILL,

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-FIVE

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about October 27, 2006, at approximately 9:40 p.m. (Call #5557 over Target Phone 7), in the Northern District of Illinois, Eastern Division,

CLINT LINZY,

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-SIX

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about October 27, 2006, at approximately 9:50 p.m. (Call #5558 over Target Phone 7), in the Northern District of Illinois, Eastern Division,

CLINT LINZY,

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-SEVEN

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about October 27, 2006, at approximately 10:30 p.m. (Call #5569 over Target Phone 7), in the Northern District of Illinois, Eastern Division,

DANIEL HILL,

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-EIGHT

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about October 28, 2006, at approximately 12:47 a.m. (Call #5598 over Target Phone 7), in the Northern District of Illinois, Eastern Division,

CLINT LINZY,

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).



COUNT TWENTY-NINE

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about October 28, 2006, at approximately 1:05 a.m. (Call #5599 over Target Phone 7), in the Northern District of Illinois, Eastern Division,

CLINT LINZY,

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about October 29, 2006, at approximately 11:39 a.m. (Call #6933 over Target Phone 6), in the Northern District of Illinois, Eastern Division,

ADAM SANDERS,

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-ONE

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about November 3, 2006, at approximately 8:28 p.m. (Call #7773 over Target Phone 6), in the Northern District of Illinois, Eastern Division,

RONDELL FREEMAN and DANIEL HILL,

defendants herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to distribute and to possess with the intent to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-TWO

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about November 13, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

ADAM SANDERS,

defendant herein, did knowingly and intentionally possessed with the intent to distribute a controlled substance, namely, 50 grams or more of mixtures and substances containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT THIRTY-THREE

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about June 20, 2007, at approximately 5:02 p.m., in the Northern District of Illinois,  
Eastern Division,

LANCE OLDEN,

defendant herein, knowingly and intentionally used a communication facility, namely a telephone,  
in committing and in causing and facilitating the commission of a felony violation of Title 21, United  
States Code, Section 841(a)(1), namely, the distribution of a controlled substances, as charged in  
Count Thirty-Four of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-FOUR

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about June 20, 2007, at Chicago, in the Northern District of Illinois, Eastern Division,

LANCE OLDEN,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 5 grams or more of mixtures and substances containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-FIVE

The SPECIAL MARCH 2007 GRAND JURY further charges:

On or about July 3, 2007, at Chicago, in the Northern District of Illinois, Eastern Division,

DANIEL HILL,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 5 or more grams of mixtures and substances containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

FORFEITURE ALLEGATION

The SPECIAL MARCH 2007 GRAND JURY further charges:

1. The allegations of Counts One through Thirty-Five of this Indictment are realleged and incorporated by reference as if fully restated herein for the purpose of alleging that certain property is subject to forfeiture to the United States pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of their violations of Title 21, United States Code, Sections 841(a)(1), 843(b) and 846, as alleged in the foregoing Indictment,

RONDELL FREEMAN, aka "Nightfall," "Fall"  
BRIAN WILBOURN, aka "Stay High," "3"  
DANIEL HILL, aka "Little Burling," "Little B"  
ADAM SANDERS, aka "Redman"  
DEMARQUIS WILLIAMS, aka "Buck," "Marco"  
SENECCA WILLIAMS, aka "Boo Boo"  
REGINALD BOOKER, aka "Bob"  
SYBLE MCCLATCHEY, aka "Silver"  
ROBERT FREEMAN, aka "G Rob," "Bob"  
CLINT LINZY, aka "Big Shorty"  
LONNIE MACK, aka "L Dub," "Dub," "4"  
LANCE OLDEN, aka "LA"  
DESHAWN SIMMONS, aka "Duke"  
MARCELL THOMAS, aka "Lil Cell," "Cell"  
DARNELL WILLIAMS, aka "Don D"

defendants herein, shall forfeit to the United States of America, pursuant to Title 21, United States Code, Sections 853(a)(1) and (2): (1) any and all property constituting and derived from any proceeds the defendants obtained, directly and indirectly, as a result of said violations; and (2) any and all property used, and intended to be used, in any manner or part to commit and to facilitate the commission of said violations.

3. The interests of the defendants, jointly and severally, subject to forfeiture to the



United States pursuant to Title 21, United States Code, Section 853, include, but are not limited to,

i. Personal Property

- (1) Assorted firearms and ammunition, including one Star Bonifacio Echeverria, model Ultra Star, 9mm semi-automatic handgun, serial number 2125519

ii. Funds

- (1) In excess of \$1,000,000, and seizures in the following amounts:
  - (a) \$1601 of United States Currency seized on August 9, 2006

iii. Real Estate

- (1) The property located at 5740 North Sheridan, Unit 3-E, Chicago, Illinois, legally described as follows:

UNIT 3-E AS DELINEATED ON THE SURVEY OF THE FOLLOWING DESCRIBED PARCEL OF REAL ESTATE: THE SOUTH 25 FEET OF LOT 4 AND ALL OF LOT 5 AND 6 IN NORTH RANGE 14 EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY ILLINOIS, WHICH SURVEY IS ATTACHED AS EXHIBIT A TO THE DECLARATION MADE BY AMERICAN NATIONAL BANK AND TRUST COMPANY OF CHICAGO, AS TRUSTEE, UNDER TRUST AGREEMENT DATE AUGUST 25, 1977 AND KNOWN AS TRUST NO. 41091, RECORDED IN THE OFFICE OF THE RECORDER OF DEEDS OF COOK COUNTY, ILLINOIS AS DOCUMENT 24231378, TOGETHER WITH AN UNDIVIDED PERCENTAGE INTEREST IN SAID PARCEL EXCEPTING FROM ALL PROPERTY, AND SPACE COMPROMISING ALL THE UNITS THEREOF AS DEFINED AND SET FORTH IN SAID DECLARATION AND SURVEY.

Permanent Real Estate Index Number: 14-05-406-022-1061.

4. By virtue of the defendants' commission of the offenses charged in Counts One through Thirty-Five of this Indictment, all right, title or interest that any defendant has in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to Title 21, United States Code, Section 853.

5. If any of the funds, property, or other items described above as being subject to forfeiture pursuant to Title 21, United States Code, Section 853(a), as a result of any act or omission of the defendants:

- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the court;
- (d) Has been substantially diminished in value; or
- (e) Has been commingled with other property which  
cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to the provisions of Title 21, United States Code, Section 853(p), to seek forfeiture of substitute property belonging to defendants, including the real property commonly known as 3517 W. Lexington Street, Chicago, Illinois, legally described as follows:

LOT 7 IN BLOCK 16 IN E.A. CUMMING AND COMPANY'S CENTRAL PARK AVENUE ADDITION SUBDIVISION OF THAT PART OF THE SOUTHEAST 1/4 OF SECTION 14, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, LYING SOUTH OF THE NORTH 40 RODS THEREOF AND NORTH OF THE NORTH LINE OF THE RIGHT OF WAY OF THE CHICAGO GREAT WESTERN RAILROAD, IN COOK COUNTY, ILLINOIS.

Permanent Real Estate Index Number: 16-14-408-017-0000.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY